UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CENTURY INDEMNITY COMPANY, as successor :	CIVIL ACTION NO.
to CCI Insurance Company, successor to Insurance :	
Company of North America; ACE PROPERTY & :	1:07-CV-10713-LLS
CASUALTY INSURANCE COMPANY (f/k/a :	
CIGNA Property & Casualty Insurance Company) on :	
behalf of Central National Insurance Company of :	
Omaha, but only as respects policies issued by it :	
through Cravens, Dargan & Company, Pacific Coast; :	
and WESTCHESTER FIRE INSURANCE :	
COMPANY (i) on behalf of TIG Insurance :	
Company, as successor to International Insurance :	
Company, and (ii) with respect to certain policies :	
allegedly issued by U.S. Fire Insurance Company, :	

                            Plaintiffs,   :

vs.   :

ROYAL INSURANCE COMPANY OF AMERICA :
as successor in interest to Phoenix Assurance :
Company of New York,   :

                            Defendant.   :

<u>DEFENDANT ROYAL INSURANCE COMPANY OF AMERICA'S MOTION UPON CONSENT TO EXTEND TIME TO ANSWER, MOVE OR OTHERWISE RESPOND TO COMPLAINT</u>

Defendant Royal Insurance Company of America ("Royal") hereby moves the Court to

extend the time to answer, move or otherwise respond to the Complaint through and including

January 21, 2008. Plaintiffs Century Indemnity Company, ACE Property & Casualty Insurance

Company and Westchester Fire Insurance Company have consented to such an extension.

Unfortunately, logistical constraints prevent the filing of a stipulation to the extension of time

prior to the original answer deadline. We plan to file such a stipulation as soon as the requisite

signatures can be obtained. We represent that: 1) the original date by which Royal was to

41831046.1

answer, move or otherwise respond to the Complaint is December 20, 2007; 2) Royal recently

retained Day Pitney LLP; and 3) this is the first request for an extension of time in this case.

Dated at Hartford, CT: December 20, 2007.

By   /s/Alfred W. J. Marks_____
       Alfred W. J. Marks (AM6272)

       DAY PITNEY LLP
       7 Times Square
       New York, NY 10036
       E-mail: amarks@daypitney.com
       Telephone (212) 297-5800
       Fax (212) 916-2940

       Attorneys for Defendant